

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

**NOTICE OF MOTION
TO WITHDRAW**

UNITED STATES OF AMERICA,

v.

19-CR-227 (JLS) (MJR)

JOSEPH BONGIOVANNI,
PETER GERACE, JR.,

Defendants.

UNITED STATES OF AMERICA,

v.

23-CR-37 (JLS) (MJR)

PETER GERACE, JR.,

Defendant.

MOTION MADE BY:

Eric M. Soehnlein, Esq.

DATE, TIME AND PLACE:

At a date and time determined by the
Court, Robert H. Jackson Courthouse,
2 Niagara Square, Buffalo NY 14202.

SUPPORTING PAPERS:

Attorney Declaration, Ex-Parte
Declaration, Ex-Parte Memorandum of
Law.

RELIEF REQUESTED:

An Order of this Court:

1. Granting undersigned's motion to
withdraw as counsel for defendant,
Peter Gerace, Jr.
2. For such other and further relief as
the Court deems just and proper.

DATED: Buffalo, New York
June 26, 2023

Respectfully submitted,

LIPPES MATHIAS LLP

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